

OBJECTIONS TO EX-U.S. AND HERNIA MESH DISCOVERY

Request for Production Responses

**Supplemental Response to Request for Production No. 2**

- Objects to documents related to hernia mesh products, which are subject to a meet and confer with the Plfs

**Supplemental Response to Request for Production No. 11**

- Objects to documents including those related to hernia mesh products

**Supplemental Response to Request for Production No. 15**

- Objects to documents including those related to hernia mesh products. Engaging in a meet and confer with the Plfs

**Supplemental Response to Request for Production No. 16**

- Objects to documents including those related to hernia mesh products
- Objects to documents relating to foreign activities or any non-US entities that are located outside the United States
- Involved in a meet and confer process with Plfs

**Supplemental Response to Request for Production No. 17**

- Objects to documents including those related to hernia mesh products
- Objects to documents relating to foreign activities or any non-US entities. Ethicon is involved in an ongoing meet and confer with Plfs on this issue.

**Supplemental Response to Request for Production No. 21**

- Objects to documents relating to foreign activities or any non-US entities that are located outside the United States
- Ethicon and Plfs continue to meet and confer concerning non-US documents

**Supplemental Response to Request for Production No. 22**

- Objects to documents relating to foreign activities or any non-US entities that are located outside the United States
- Ethicon and Plfs continue to meet and confer concerning non-US documents

**Supplemental Response to Request for Production No. 23**

- Objects to documents relating to foreign activities or any non-US entities that are located outside the United States
- Ethicon and Plfs continue to meet and confer concerning non-US documents

**Supplemental Response to Request for Production No. 24**

- Objects to documents relating to foreign activities or any non-US entities that are located outside the United States
- Ethicon and Plfs continue to meet and confer concerning non-US documents

**Supplemental Response to Request for Production No. 25**

- Objects to documents including those related to hernia mesh products
- Objects to documents relating to foreign activities or any non-US entities that are located outside the United States
- Ethicon and Plfs continue to meet and confer concerning non-US documents

**Supplemental Response to Request for Production No. 26**

- Objects to documents including those related to hernia mesh products
- “PROLIFT hernia mesh system” does not exist

**Supplemental Response to Request for Production No. 28**

- Objects to documents including those related to hernia mesh products

**Supplemental Response to Request for Production No. 29**

- Objects to documents including those related to hernia mesh products
- Parties are currently involved in a meet and confer process concerning hernia mesh documents

**Supplemental Response to Request for Production No. 47**

- Objects to documents including those related to hernia mesh products

**Supplemental Response to Request for Production No. 48**

- Objects to documents including those related to hernia mesh products
- Ethicon and Plfs continue to meet and confer concerning the scope of production concerning hernia mesh products

**Supplemental Response to Request for Production No. 60**

- Objects to documents relating to foreign activities or any non-US entities that are located outside the United States
- Parties continue to meet and confer concerning the scope of production of documents located outside of the US

**Supplemental Response to Request for Production No. 65**

- Objects to documents relating to foreign activities or any non-US entities that are located outside the United States

- Parties continue to meet and confer concerning the scope of production of documents located outside the US

**Supplemental Response to Request for Production No. 67**

- Objects to documents including those related to hernia mesh products

**Supplemental Response to Request for Production No. 78**

- Objects to documents including those related to hernia mesh products

**Supplemental Response to Request for Production No. 79**

- Objects to documents including those related to hernia mesh products

**Supplemental Response to Request for Production No. 80**

- Objects to documents including those related to hernia mesh products

**Supplemental Response to Request for Production No. 82**

- Objects to documents relating to foreign activities or any non-US entities that are located outside the United States
- Ethicon and Plfs continue to meet and confer concerning this issue

Interrogatory Responses

**Supplemental Response to Interrogatory 1**

- Objects to interrogatory relating to foreign regulatory submissions
- Ethicon is currently working with Plfs to narrow and prioritize the scope of foreign regulatory production

**Supplemental Response to Interrogatory 9**

- Objects to interrogatory relating to foreign regulatory activities
- Ethicon is continuing to meet and confer with Plfs concerning foreign regulatory submissions

**Supplemental Response to Interrogatory 22**

- Objects to the production of information regarding hernia mesh

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